

May 05, 2023

s/ D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*A black iPhone, believed to be an iPhone 11, bearing  
serial number GXGFW0VQN72J, currently in ATF  
custody, as further described in Attachment A

Case No. 23 MJ 71

Matter No. 2022R00355

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under  
penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the  
property to be searched and give its location)*:

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed *(identify the  
person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841; 18 U.S.C. §§ 922(o); and 924(c)	Distribution and possession with intent to distribute controlled substances; Possession of a firearm in furtherance of drug trafficking; and Possession of a machinegun.

The application is based on these facts:

See Attached Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days: \_\_\_\_\_)* is requested under  
18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

RICHARD CONNORS

Digitally signed by RICHARD CONNORS  
Date: 2023.05.04 13:55:42 -05'00'*Applicant's signature*

Richard Connors, ATF SA

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_  
telephone \_\_\_\_\_ *(specify reliable electronic means)*.

Date: 5/5/2023

*William E. Duffin**Judge's signature*

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN  
APPLICATION FOR A SEARCH WARRANT**

I, Special Agent Richard Connors, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property—an electronic device—which is currently in law enforcement possession, and the extraction from that property of electronically stored information described in Attachment B.

2. I am employed as a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) assigned to the Milwaukee Field Office since October of 2015. I have been employed as a full-time law enforcement officer for over 8 years. I have received training at the Federal Law Enforcement Training Center in Glynco, GA. I attended the Criminal Investigator Training Program, as well as ATF's Special Agent Training Program. I have received training in the investigation of unlawful possession of firearms, the unlawful transfer of firearms, and the unlawful dealing in firearms without a dealers' license. Prior to becoming a Special Agent with the ATF, I received two (2) bachelor's degrees from Northern Illinois University in the fields of Sociology and International Relations. I have received a master's degree from Northern Illinois University in the field of American Government.

3. I have received training in the investigation of firearms trafficking, and I work alongside several senior ATF agents who have worked extensive firearms trafficking investigations in the past. I have additionally worked multiple investigations involving

individuals prohibited from possessing firearms. I know that there are ten categories that can prohibit a person from possessing firearms to include being a previous convicted felon.

4. I have participated in several firearms trafficking investigations that involved the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these computers, cellular phones, cameras, and other digital storage devices. On many occasions, this electronic data has provided evidence of the crimes being investigated and corroborated information already known or suspected by law enforcement.

5. Furthermore, I know from training and experience it is common for drug users, drug dealers, firearms traffickers, and firearms straw purchasers to communicate via cellular phone through a variety of electronic media. For example, drug dealers often use text (SMS) messaging, phone calls, electronic mail, messaging applications, and/or various social media applications such as Facebook, Instagram, or Twitter, to facilitate their distribution. Your affiant knows from his training that drug traffickers will talk in “street terms” and often code their language to make their actions difficult to detect by law enforcement.

6. I have participated in numerous investigations involving the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these devices. I have also participated in investigations involving the use of historical and prospective location information to identify targets, map patterns of travel, corroborate other evidence, and apprehend persons to be arrested. Through my experience and training, I am aware that electronic devices, such as cellphones, can be used to store and save audio, video, and text files that can link to a variety of criminal activity. I am also aware that smart cellphones are capable of capturing location history for the device. On numerous

occasions, this electronic evidence has provided proof of the crimes being investigated and corroborated information already known or suspected by law enforcement. During the course of my investigations, I have regularly used electronic evidence relating to the commission of criminal offenses, including intent, motive, manner, means, and the identity of co-conspirators.

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

8. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Jacob FLOWERS has committed violations of Title 18 United States Code Section 920(o) and Title 21, United States Code, Sections 841 and 846.

9. Further, there is probable cause to search the locations described in Attachment A for evidence of these crimes, as described in Attachment B.

#### **IDENTIFICATION OF THE DEVICE TO BE EXAMINED**

10. The property to be searched is the cellular phone recovered during the arrest of Jacob FLOWERS on April 20, 2023, more fully described as follows (hereinafter referred as “Device”):

- a. a black iPhone, believed to be an iPhone 11, bearing serial number GXGFW0VQN72J, in a black and blue case listed under ATF case number 772120-22-0069, item 000109.

The Device is currently located at the ATF Milwaukee Field Office in Milwaukee, Wisconsin.

11. The applied-for warrant would authorize the forensic examination of the Device for the purpose of identifying electronically stored data particularly described in Attachment B.

### **PROBABLE CAUSE**

#### **A. Background**

12. Beginning in July 2022, Drug Enforcement Agency (DEA), ATF and the Waukesha Metro Drug Unit, hereinafter referred to as “case agents,” began investigating an armed drug trafficking organization (ADTO) operating in the Eastern District of Wisconsin which involves Azjuan K. MERIWETHER, Dontrell Q. FRANKLIN, Jacob FLOWERS, and other identified and unidentified subjects. Through confidential sources, undercover controlled buys, physical surveillance, electronic surveillance, social media records and record jail calls case agents learned the ADTO sells fentanyl, purported to be heroin, methamphetamines, cocaine, ghost guns, and switches.

13. Since July 5, 2022, a confidential source (CS) and an undercover agent (UC) participated in about 18 controlled buys with members of the ADTO including Azjuan K. MERIWETHER, Dontrell Q. FRANKLIN, Savanna J. WILLIAMS, Daniel RODRIGUEZ-PEREZ, and other ADTO members. Between July 2022 and March 2023, CS and/or UC obtained approximately 750 grams of heroin, which also field tested positive for fentanyl; 240 grams of methamphetamine; and 155 grams of cocaine from the ADTO. Additionally, UC obtained approximately 20 firearms from the ADTO. Some of the firearms were installed with a Glock auto-sear device (switch), which converts a semi-automatic firearm into a full-automatic firearm, and other times the UC just purchased a Glock auto-sear device. The UC obtained approximately nine Glock auto-sear devices from the ADTO. ATF tested fired the Glock auto-

sear devices and determined they converted a semi-automatic firearm into a fully automatic firearm, meaning one pull of a firearm trigger caused the firearm to fire multiple bullets.

14. The CS information is credible and reliable, CS has given information concerning individuals involved in illegal activities which has been independently verified through this investigation. The information has been verified through controlled buys, video recordings obtained during the controlled buys, queries through law enforcement databases, and surveillance. CS is cooperating with law enforcement for consideration on pending criminal drug charges in Waukesha County as well as previous drug charges in Kenosha County. CS has no arrests or convictions relating to dishonesty but has had past arrests or convictions for felony drug offenses and other felony bodily harm offenses.

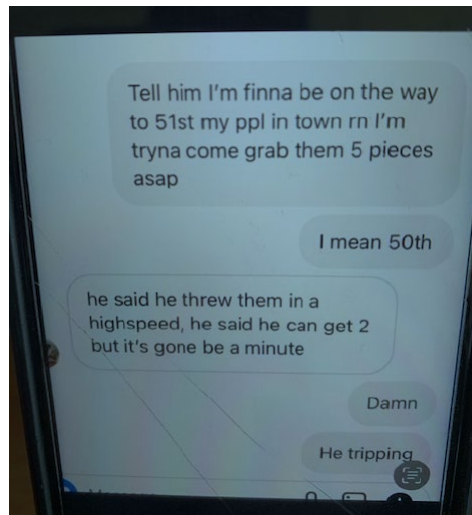
#### **B. Identification of Jacob FLOWERS**

15. As part of the investigation into the ADTO, case agents attempted to identify the firearms and Glock auto-sear devices sources for the ADTO. During the undercover controlled buy on October 19, 2022, with MERIWETHER, case agents were aware MERIWETHER communicated with one of his firearm sources using Instagram.

16. On November 8, 2022, case agents obtained an Instagram account warrant for the contents of the Instagram account associated with MERIWETHER identified as “thereal\_chefdon92.” Magistrate Judge Nancy Joseph authorized the warrant. That day, case agents served the warrant for the Instagram account on Meta Platforms. Case agents received the results from Meta Platforms on December 12, 2022.

17. Case agents queried dates of interest regarding the investigation when MERIWETHER provided the UC with firearms. Of note, a conversation of interest was located with the user “luh\_joebrown”, Instagram ID # 1118850930. During an undercover buy with the

UC on October 19, 2022, MERIWETHER's Glock auto-sear device "source" could not provide the sears as previously arranged. MERIWETHER showed the UC a message between MERIWETHER his alleged source (Figure 1).



(Figure 1)

18. Based on these messages case agents believed MERIWETHER's Glock auto-sear device source was involved in a police pursuit and threw out the devices.

19. Case agents located conversations pertaining to Glock auto-sears devices with the user "luh\_jowbrown," on the same date of the undercover buy, October 19, 2022. The below conversation occurred between "luh\_jowbrown" and MERIWETHER (thereal\_chefdon92) (Figure 2):

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 16:25:45 UTC  
**Body** Glock 19x  
**Share** **Date Created** Unknown  
**Uri** [https://instagram.com/stories/thereal\\_chefdon92/2952592818813152270](https://instagram.com/stories/thereal_chefdon92/2952592818813152270)

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:31:35 UTC  
**Body** You started a video chat

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:32:29 UTC  
**Body** Video chat ended  
**Call Record** **Missed** false  
**Duration** 48

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 16:33:08 UTC  
**Body** MissinU sent a photo.  
**Attachments** image-3235849723352828 (3235849723352828)  
**Type** image/jpeg  
**Size** 253143  
**URL** [https://interncache-eag.fbcdn.net/v/t1.15752-9/308814137\\_3235849726686161\\_8445878611371303189\\_n.jpg?ccb=1-7&\\_nc\\_sid=73a6a0&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2ZVuX2NsaWVudC9pbW9nZW46RFJlTWVkaWVdGlscy9&\\_nc\\_ad=z-m&\\_nc\\_cid=0&\\_nc\\_ht=interncache-eag&oh=03AdRh5co1EVKE6X1lc4UnZOw9h5MjXM03kjin9dOv9kFK3g&oe=63BF21E5](https://interncache-eag.fbcdn.net/v/t1.15752-9/308814137_3235849726686161_8445878611371303189_n.jpg?ccb=1-7&_nc_sid=73a6a0&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2ZVuX2NsaWVudC9pbW9nZW46RFJlTWVkaWVdGlscy9&_nc_ad=z-m&_nc_cid=0&_nc_ht=interncache-eag&oh=03AdRh5co1EVKE6X1lc4UnZOw9h5MjXM03kjin9dOv9kFK3g&oe=63BF21E5)



(Figure 2)

20. The above firearm (Figure 2) appears to be a Glock 19x firearm affixed with a Glock auto-sear device, thus making the firearm applicable to the National Firearms Act (NFA) Violations and regulation. MERIWETHER and “luh\_jowbrown” messages continued (Figures



3, 4 and 5). During their conversation, as outlined below, “luh\_jowbrown,” discussed a “block,” which based on my training and experience is street slang for firearm.

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:40:08 UTC  
**Body** Wya

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:40:19 UTC  
**Body** You started a video chat

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:43:35 UTC  
**Body** Video chat ended

**Call Record** **Missed** false  
**Duration** 191

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:49:14 UTC  
**Body** ?

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:55:44 UTC  
**Body** You started a video chat

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 16:56:19 UTC  
**Body** Video chat ended

**Call Record** **Missed** false  
**Duration** 23

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:00:33 UTC  
**Body** I'm passing mill road

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:03:09 UTC  
**Body** Bro ain't tryna sell his block frl but you kan lime grab my shit

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:03:26 UTC  
**Body** lght

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:03:48 UTC  
**Body** Send addy brody I'm on brown deer rn

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:06:50 UTC  
**Body** You started a video chat

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:07:19 UTC

(Figure 3)

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**Body**  
Video chat ended

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:10:15 UTC  
**Body** Brody Wtw I know u Aint have me come on a blank mission

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:50:44 UTC  
**Body** Aye blood who scary ? lan nvr been scared of shit you not on shit internet ass nigga  
**Share** **Date Created** Unknown  
**Url** [https://instagram.com/stories/thereal\\_chefdon92/2952630472377595575](https://instagram.com/stories/thereal_chefdon92/2952630472377595575)

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:51:39 UTC  
**Body** Fym nigga ion know you thirsty ass niggas I was tryna get da back plate Fa yo ass

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:51:41 UTC  
**Body** You started a video chat

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:53:08 UTC  
**Body** Video chat ended  
**Record** **Missed** false  
**Duration** 82

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 17:55:34 UTC  
**Body** You sent an attachment.

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:57:40 UTC  
**Body** Liked a message

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:58:45 UTC  
**Body** Fs Brody lan on no janky shit I wasn't tryna have no bad business makin sure everything in order

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 17:58:47 UTC  
**Body** Player shit

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 18:01:51 UTC  
**Body** Omm you ain't wrong but let a nigga know damn[] can't be going ghost bro I be on them tool heavy bro every time I'm come to town brody

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 18:02:33 UTC  
**Body** I be tryna take some new to Kentucky every week so nigga imma be asking all the time

(Figure 4)

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 18:04:27 UTC  
**Body** But I got all that sit bro back plate custom slides allat

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 19:15:53 UTC  
**Body** Liked a message

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-19 19:17:57 UTC  
**Body** I'm otw to da lo end ima hit you when I touch

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-19 19:18:48 UTC  
**Body** lght

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-20 02:04:37 UTC  
**Body** Brody Wtw

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-22 14:15:52 UTC  
**Body** luh\_joebrown started a video chat

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-22 14:16:23 UTC  
**Body** Video chat ended  
**Record** **Missed** false  
**Duration** 23

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:46:47 UTC  
**Body** Brody

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:46:54 UTC  
**Body** Huh

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:47:09 UTC  
**Body** Ain't nun around I'm On my way to Milwaukee

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:47:23 UTC  
**Body** Glock 17 with switch

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:47:33 UTC  
**Body** Hm

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:47:39 UTC  
**Body** 1400

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:47:49 UTC  
**Body** Rn today

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(Figure 5)

21. Based on my training and experience, the discussion regarding a “black plate” between MERIWETHER and “luh\_jowbrown” relates to the Glock auto sear device that can be attached to a firearm to make the firearm fully automatic. Further, “luh\_jowbrown” offers MERIWETHER a Glock 17 with switch on October 26, 2022 (Figure 6). This statement demonstrates “luh\_jowbrown” has knowledge of what the “switch” accomplishes, turning the firearm into fully automatic capacity. MERIWETHER and “luh\_jowbrown” conversation continues regarding the discussion of Glock auto sears.

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**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:49:08 UTC  
**Body** Damn Only got like 11 on me to spend lmk tho

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:49:21 UTC  
**Body** I ain't gone be there till like 9:30 tho

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:56:52 UTC  
**Body** Kant even do it Fa 12

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 22:57:12 UTC  
**Body** I kan do 13

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 22:58:32 UTC  
**Body** Only reason ion wanna grab is is cause I got like 3 buttons I was finna put atleast 2 of ain't no need for no extra button rn

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 23:10:43 UTC  
**Body** I still got 19x

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 23:10:45 UTC  
**Body** Just need an ejector dats 30 bucks I a throw you a deal

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 23:26:51 UTC  
**Body** Atwats the ejector

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 23:27:16 UTC  
**Body** The one wit no back piece?

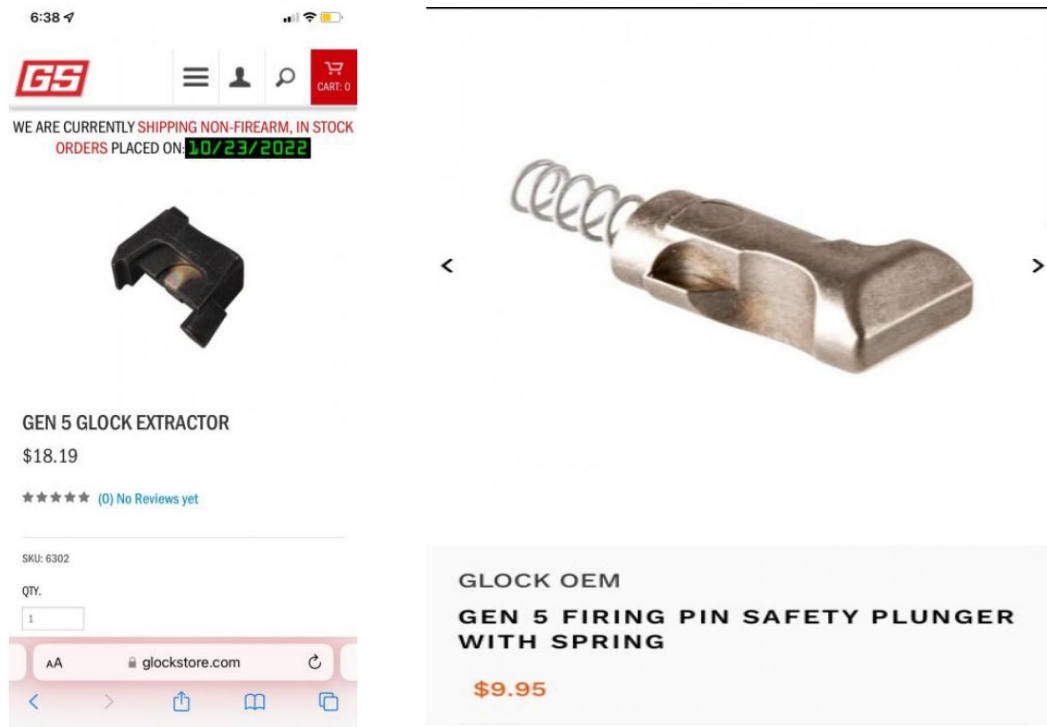
**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 23:37:03 UTC  
**Body** It gotta back plate just no ejector had to throw switch onna speed n it kame off

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 23:37:10 UTC  
**Body** Finna send pic

**Author** thereal\_chefdon92 (Instagram: 53464415397)  
**Sent** 2022-10-26 23:37:33 UTC  
**Body** Aw damn ok

**Author** luh\_joebrown (Instagram: 1118850930)  
**Sent** 2022-10-26 23:40:22 UTC  
**Body** MissinU sent a photo.

**Attachments** image-478239597615710 (478239597615710)  
**Type** image/jpeg  
**Size** 111219  
**URL** [https://interncache-eag.fcdn.net/v/t1.15752-9/312527047\\_478239600949043\\_9664733832652](https://interncache-eag.fcdn.net/v/t1.15752-9/312527047_478239600949043_9664733832652)



(Figure 6)

22. Based on my training, experience and the convocation between MERIWETHER and “luh\_jowbrown,” the user “luh\_joebrown” displays an enhanced knowledge of the workings of a Glock back plate, this is the piece that must be removed to install a Glock auto sear. This displays a knowledge of the workings of the firearm and what it takes to convert the firearm to an automatic.

23. Case agents reviewed the aforementioned messages and determined the individual messaging MERIWETHER possess a great deal of knowledge concerning Glock automatic conversion devices. Additionally, the conversations demonstrated “luh\_jowbrown” offered MERIWETHER on two separate occasions a Glock firearm with a “switch.”

24. Investigators were able to identify the user of the Instagram account in question as Jacob FLOWERS (DOB: XX/XX/2004) with an address of 4106 North 24th Place, Milwaukee, Wisconsin through the use of publicly available social media and police reports.

25. Case agents located a Facebook page listed as “Luh Joe Brown” which posted the same exact publicly viewable photos as the Instagram account “luh\_joebrown.” Case agents located a photo on the publicly viewable page depicting FLOWERS displaying a golf “MB” chain and wearing a blue graduation cap. Case agents discovered the blue gowns and caps were utilized by Milwaukee Public School Marshall High School for their graduation event on May 31, 2022. As the name “Jacob FLOWERS” was read across the loudspeaker via the livestream of the video the same individual who appears in the Facebook account “Luh Joe Brown” walked across the stage and received his diploma. Case agents compared the publicly viewable photos from the Instagram account to the Facebook account and the two appear similar.

26. Case agents have also reviewed the publicly viewable photos from the Instagram account “luh\_joebrown.” In a photo dated August 16, 2022, the photos depict who case agents believe to be FLOWERS standing in a basement with a suspected Glock handgun with an apparent automatic conversion device (Figure 7).



(Figure 7)



27. Case agents also observed a photo dated December 6, 2022, the photo depicts a masked individual displaying a large stack of United States currency and a suspected handgun (Figure 8). The location posted to this photo was tagged as “24<sup>th</sup> PL.” The listed address the Milwaukee Police Department (MPD) has for FLOWERS is 4106 North 24th Place, Milwaukee, Wisconsin.



(Figure 8)

28. Lastly, case agents are aware on October 22, 2022, the MPD took a shot fired complaint at 4072 North 24th Place, Milwaukee, Wisconsin. FLOWERS was identified as a suspect in the shooting during the course of the investigation. Seventeen 9mm luger casings were recovered in the street where the suspect was believed to have shot from, it should be noted a Glock 19X and Glock 17 are each 9mm firearms in which FLOWERS offered to MERIWETHER on October 19, 2022, and October 26, 2022, respectively. Lastly, witnesses to the event identified the shooter as possessing a tan handgun, one that could match the description of the firearm sent to MERIWETHER in Figure 2.

29. On December 20, 2022, MPD was called to a shooting outside the Walmart located at 401 East Capitol Drive, Milwaukee, Wisconsin. FLOWERS and another individual left the vehicle that was shot at and entered the Walmart. MPD responded and located FLOWERS in the store. FLOWERS exited the store and ran from officers. MPD officers chased FLOWERS and observed FLOWERS throw a Glock 21 .45 caliber, bearing serial number AGSH548, with a Glock auto sear device into a fenced area at 326 East Keefe Avenue, Milwaukee, Wisconsin. FLOWERS was eventually arrested.

30. MPD examined the vehicle that FLOWERS was in and that was shot at during the incident. Both driver side doors were open, and the front driver window was shattered. MPD observed there was no column damage was evident and a possible gunshot hole in the rear of the vehicle. MPS located a baggy in the front open driver door compartment which contained controlled substances. This was the same side that FLOWERS exited the vehicle. MPD seized the following items in the vehicle: 12.75 grams of cocaine, 3.39 grams of cocaine, and 3.25 grams of heroin that tested positive for fentanyl. MPD never located a cellphone for FLOWERS during this incident.

31. On April 9, 2023, your affiant was reviewing the publicly viewable Instagram account "Luh\_joebrown12." Your affiant reviewed a "story" on the page which depicted FLOWERS and an unknown black male possessing what appears to be Glock handguns. The tag on the post states "Everybody opps" (Figure 9). Based on training and experience, your affiant is aware this refers to the opposition or the rival gang members. Based on this posting, it appears FLOWERS is still using a cell phone to post photos of him possessing firearms. A phone located in his custody could contain such photos.



(Figure 9)

32. Your affiant is aware on April 11, 2023, a federal grand jury in the Eastern District of Wisconsin indicted Jacob FLOWERS for possession with the intent to deliver a controlled substance, Title 21, United States Code, Sections 841 (a)(1) and 841 (b)(1)(C); possession of a firearm in furtherance of drug trafficking, Title 18, United States Code, Section 924(c)(1)(A)(i); and possession of a machine gun, Title 18, United States Code, Sections 922(o) and 924 (a)(2). A subsequent arrest warrant was issued for FLOWERS.

33. On April 20, 2023, federal investigators went to the home of Jacob FLOWERS located at 4106 North 24th Place, Milwaukee, Wisconsin. FLOWERS mother opened the door. Federal investigators asked FLOWERS's mother if he were home, at that point, investigators observed FLOWERS appear around the corner in the structure. Case agents safely took FLOWERS into custody. Located in FLOWERS's hand was a black iPhone in a black and blue (Device). It was later determined the Device has serial number GXGFW0VQN72J and is believed to be an iPhone 11. Case agents took custody of Device at that point in time.



Additionally, as FLOWERS was sitting in the rear seat of the squad car, he yelled the passcode to the seized phone to his mother demonstrating ownership of the Device.

34. The Device is currently in the lawful possession of ATF. ATF seized the Device during the execution of a federal arrest warrant. Affiant now seek this additional warrant out of an abundance of caution to be certain that an examination of Device, will comply with the Fourth Amendment and other applicable laws.

35. The Device is currently in storage at the ATF Milwaukee Field Office in Milwaukee, Wisconsin. The Device is inventoried under ATF inventory number 000109, under case number 772120-22-0069. In my training and experience, I know that the Device has been stored in a manner in which its contents are, to the extent material to this investigation, in substantially the same state as they were when the Device first came into the possession of the ATF.

36. Your affiant is aware drug and firearm traffickers will often keep and store customer lists on cell phones to include pricing for such narcotics or firearms. Drug and firearm traffickers will contact consumers whenever they have product available via SMS text, MMS text, or various social media platforms. Customers will then respond to the trafficker to arrange the sale of the narcotics and/or firearms. Your affiant has reviewed multiple examples of these type of communications on the phones of suspected drug and firearm traffickers.

37. Further, case agents are aware that this ADTO uses cellular phones and social media, including Instagram, to conduct this illegal ADTO activities including obtaining firearms and obtaining and selling controlled substances. I am also aware individuals can access social media through their cellular phones. Based on this knowledge along with the information outlined previously in this affidavit case agents, it is believed that FLOWERS's Instagram

account and the Device contain valuable information that could be used as evidence for the possible crimes of distribution and possession with intent to distribute controlled substances, possession of a firearm in furtherance of drug trafficking, and possession of a machinegun, in violation of Title 18, United States Code Section 922(o) and 924(c); and Title 21, United States Code Sections 841.

### **TECHNICAL TERMS**

38. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a) Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.
- b) Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.
- c) GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some

GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna’s latitude, longitude, and sometimes altitude with a high level of precision.

- d) IP Address: An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.
- e) Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

39. Based on my training, experience, and research, I know that the Devices have capabilities that allow it to serve as a wireless telephone, digital camera and video recorder, portable media player, internet web browser, and GPS navigation device. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

#### **ELECTRONIC STORAGE AND FORENSIC ANALYSIS**

40. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the

Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

41. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Devices was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Devices because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created.
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

42. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the Devices consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

43. *Manner of execution.* Because this warrant seeks only permission to examine the Device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

### **CONCLUSION**

44. Based on the above information provided in this affidavit, I believe there is probable cause that the Device recovered during the arrest of FLOWERS on April 20, 2023, contains evidence the crimes of distribution and possession with intent to distribute controlled substances, possession of a firearm in furtherance of drug trafficking, and possession of a machinegun, in violation of Title 18, United States Code Section 922(o) and 924(c); and Title 21, United States Code Sections 841 committed by Jacob FLOWERS and other identified and unidentified subjects.

**ATTACHMENT A**  
**Property to Be Searched**

The property to be searched is the cellular phone recovered during the arrest of Jacob FLOWERS on April 20, 2023, more fully described as follows (hereinafter referred as “Device”):

- a. a black iPhone, believed to be an iPhone 11, bearing serial number GXGFW0VQN72J, in a black and blue case listed under ATF case number 772120-22-0069, item 000109.

The Device is currently located at the ATF Milwaukee Field Office in Milwaukee, Wisconsin.

**ATTACHMENT B**  
**Particular Things to be Seized**

1. All records on the Device described in Attachment A that relate to violations Jacob FLOWERS has committed of Title 18 United States Code Section 922(o) and 924(c) and Title 21, United States Code, Sections 841.

- a. Preparatory steps taken in furtherance of these crimes;
- b. lists of narcotics and firearms dealers and related identifying information;
- c. types, amounts, and prices of drug and firearm transactions, as well as dates, places, and amounts of specific transactions;
- d. any information related to sources of drugs or firearms (including names, addresses, phone numbers, or any other identifying information);
- e. any information related to FLOWERS's purchase, receipt, or possession of firearms;
- f. Any audio, video, and/or photograph(s) files on the phone of criminal activity or of evidentiary value;
- g. All voicemail and call records;
- h. All text messages and call history;
- i. Contact list, to include names, addresses, phone numbers, and/or email addresses;
- j. All social media sites used and applications for social media sites;
- k. All internet activity;
- l. All location data including from the phone and/or from any downloaded applications;
- m. any information recording FLOWERS's schedule or travel to the present;
- n. all bank records, checks, credit card bills, account information, and other financial records relevant to the sale and/or trade of narcotics and firearms;
- o. photos, videos, IP addresses, contact information, contact lists;
- p. text messages, social media messages and content, SMS messages, iMessage data, relating to the sale and/or trade of narcotics and firearms;

- q. electronic mail to include the content of the emails, and associated email addresses, relating to the sale and/or trade of narcotics and firearms;
- 2. Evidence of user attribution showing who used or owned the Devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;
- 3. Records evidencing the use of the Internet Protocol address to communicate, including:
  - a. records of Internet Protocol addresses used;
  - b. records of Internet activity, including firewall logs, caches, browser history and cookies, “bookmarked” or “favorite” web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.



May 05, 2023

s/ D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

In the Matter of the Search of )

(Briefly describe the property to be searched  
or identify the person by name and address) )A black iPhone, believed to be an iPhone 11,  
bearing serial number GXGFW0VQN72J, currently  
in ATF custody, as further described in Attachment A )

Case No. 23 MJ 71

Matter No.2022R00355

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin  
(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before 5/19/2023 (not to exceed 14 days)☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. William E. Duffin  
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)☐ for        days (not to exceed 30) ☐ until, the facts justifying, the later specific date of       .Date and time issued: 5/5/2023 at 9:33 AM

Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

## Return

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name(s) of any person(s) seized:

## Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

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*Executing officer's signature*

---

*Printed name and title*

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- e. any information related to FLOWERS's purchase, receipt, or possession of firearms;
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- j. All social media sites used and applications for social media sites;
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- l. All location data including from the phone and/or from any downloaded applications;
- m. any information recording FLOWERS's schedule or travel to the present;
- n. all bank records, checks, credit card bills, account information, and other financial records relevant to the sale and/or trade of narcotics and firearms;
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- q. electronic mail to include the content of the emails, and associated email addresses, relating to the sale and/or trade of narcotics and firearms;
- 2. Evidence of user attribution showing who used or owned the Devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;
- 3. Records evidencing the use of the Internet Protocol address to communicate, including:
  - a. records of Internet Protocol addresses used;
  - b. records of Internet activity, including firewall logs, caches, browser history and cookies, “bookmarked” or “favorite” web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.